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8	CARSÓN INDUSTRIES, INC.		
9	UNITED STATES	DISTRICT COURT	
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	CADCON INDICATORS INC. a Court	Case No. 3:14-cv-01769-NC	
12	CARSON INDUSTRIES, INC., a South Carolina corporation,		
13	Plaintiff,	DECLARATION OF DAVID A. DEGROOT IN SUPPORT OF	
14	v.	OPPOSITION TO MOTION TO	
15	AMERICAN TECHNOLOGY	DISMISS FOR INSUFFICIENT SERVICE OF PROCESS	
16	NETWORK, CORP., a California corporation, dba American Technologies	D 4 I 1 2 2014	
17	Network, American Technologies Network, Corp., and ATN Corp.,	Date: July 2, 2014 Time: 1:00 p.m.	
18	Defendant.	Date action filed: April 16, 2014	
19	Defendant.		
20			
21	I, David A. DeGroot, declare as follows:		
22			
23	1. I am special counsel wit	h the law firm of Sheppard Mullin Richter &	
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25			
26	declaration. If called upon to testify as a witness, I could and would testify competently to		
27	the matters in this declaration.		
28			

1	2. This declaration is submitted in support of Carson's Opposition to		
2	ATN's Motion to Dismiss.		
3			
4	3. A true and correct copy of an email dated May 14, 2014 from John J.		
5	Hartford to me and my colleague Paul Malingagio is attached hereto as Exhibit 1.		
6			
7	4. A true and correct copy of my letter dated May 15, 2014 to John J.		
8	Hartford, along with two proofs of service that were attached to that letter, is attached		
9	hereto as Exhibit 2.		
10			
11	5. A true and correct copy of an email string consisting of		
12	correspondence among Mr. Hartford, Mr. Malingagio and me between May 16 and May		
13	21, 2014 is attached hereto as Exhibit 3.		
14			
15	6. A true and correct copy of an email dated June 9, 2014 from me to		
16	John J. Hartford, which included a copy of the June 3, 2014 proof of service on James		
17	Munn that is now Docket no. 14, is attached hereto as Exhibit 4. I also followed up with an		
18	additional email to Mr. Hartford on June 11 requesting a response. Someone identifying		
19	himself as from Mr. Hartford's office called my on or about June 12 to state that he would		
20	pass along the email to Mr. Hartford. To date, I have not heard further from Mr. Hartford		
21	or his office.		
22			
23	I declare under penalty of perjury under the laws of the United States that the		
24	foregoing is true and correct. Executed on June 17, 2014, at San Francisco, California.		
25			
26	/s/ David A. DeGroot DAVID A. DeGROOT		
27	DAVID A. DEGROOT		
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